

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

**EXHIBIT 19**

to Plaintiff's  
Opposition

SUSAN COONEY,

Plaintiff,

**COPY**

vs.

Docket No. 0411572 JLT

SAYBROOK GRADUATE SCHOOL and  
RESEARCH CENTER, and MAUREEN  
O'HARA, Individually,

Defendants.

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Deposition of

ALAN G. VAUGHAN, Ph.D.

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MARCH 16, 2006

NOTICING ATTORNEY, PAUL W. MORENBERG, ESQ.

REPORTED BY: JEANINE FARRELL, CSR NO. 7774

G O L D E N G A T E R E P O R T E R S L L C  
35 Mitchell Boulevard Suite 8  
San Rafael CA 94903-2010  
(415) 491-4611 \* 800-442-4611  
FAX (415) 491-4635

e-mail: ggr35@depos.com web: <http://www.depos.com>

1 appearance pursuant to subpoena is not a waiver of  
2 the fact that this is not a discoverable -- of  
3 discoverable set of information. And I won't further  
4 state that objection today.

5 MR. MORENBERG: Q. Could you tell me who  
6 asked you to help develop the licensing information  
7 bulletin?

8 A. Catherine Clark and Art Bohart.

9 Q. And did they ask you to consider developing  
10 that in an individual meeting -- strike that.

11 Did you meet with them individually or did  
12 you have a group meeting with all?

13 A. It was a joint meeting.

14 Q. And do you recall when that meeting took  
15 place?

16 A. I do not.

17 Q. Was it shortly after you joined Saybrook or  
18 some considerable time afterwards?

19 MS. GARCIA: Objection.

20 THE WITNESS: Some considerable time  
21 afterwards.

22 MR. MORENBERG: Q. Can you provide your  
23 best estimate as to when in your employment that  
24 discussion occurred?

25 A. Maybe three or four months.

1 Q. And tell me everything you can recall about  
2 that discussion?

3 A. It was over lunch and we were talking about  
4 -- I came in sort of mid-year and so it was over  
5 lunch and we were talking about some of the things  
6 that they might need done given my background. And I  
7 was actually learning the technology. And they asked  
8 me if I would help them develop a web page that would  
9 be -- would provide additional education to students  
10 on the regulatory scheme of the field of psychology  
11 and to facilitate interaction between the students  
12 and their local psychology boards and then to consult  
13 with students. If questions specific to the statutes  
14 -- state statutes of what a psychology rules arose  
15 that needed some clarification. So it was  
16 specifically in a consultive capacity to the  
17 students.

18 Q. When you refer to your background, is it  
19 fair to say you're referring to your legal education  
20 as well as your psychology background?

21 A. I'm not -- I don't understand the question.

22 Q. Maybe it was unclear. During your testimony  
23 I believe you made reference to your background --  
24 strike that.

25 MR. MORENBERG: Could you read back the last

1 part of his answer.

2 (The record was read back as follows:

3 Q. "It was over lunch and we were  
4 talking about -- I came in sort of mid-year and so  
5 it was over lunch and we were talking about some  
6 of the things that they might need done given my  
7 background. And I was actually learning the  
8 technology. And they asked me if I would help  
9 them develop a web page that would be -- would  
10 provide additional education to students on the  
11 regulatory scheme of the field of psychology and  
12 to facilitate interaction between the students and  
13 their local psychology boards and then to consult  
14 with students. If questions specific to the  
15 statutes -- state statutes of what a psychology  
16 rules arose that needed some clarification. So it  
17 was specifically in a consultive capacity to the  
18 students.")

19 MR. MORENBERG: Q. I just want to ask you  
20 what you meant by the word background, were you  
21 referring to your legal education?

22 A. I'm sorry. I was -- just got absorbed with  
23 everything she said so my -- what was it again that I  
24 said about the background?

25 Q. I don't want to put words in your mouth.

1 MR. VARTAIN: Let's have it read back.

2 THE WITNESS: Yes.

3 (The record was read back as follows:

4 Q. "It was over lunch and we were  
5 talking about -- I came in sort of mid-year and so  
6 it was over lunch and we were talking about some  
7 of the things that they might need done given my  
8 background. And I was actually learning the  
9 technology.")

10 MR. MORENBERG: Q. When you referred to  
11 your background as being of interest to Dr. Clark and  
12 or Dr. Bohart, what did you mean?

13 A. Just that I had a lot of experience in  
14 clinical practice and teaching a range of courses.  
15 And so my general background -- so what exactly I was  
16 going to do -- which courses I was going to teach and  
17 the concentration and how I might be able to help  
18 them with this project.

19 Q. With respect to the project, did they  
20 indicate to you that your legal background would be  
21 an asset in helping students to understand licensing  
22 standards?

23 MS. GARCIA: Objection.

24 THE WITNESS: They thought that I would  
25 understand the regulations and that I would be able

1 to help the students with that.

2 MR. MORENBERG: Q. And do you agree that  
3 you felt that you would be able to understand the  
4 regulations?

5 THE WITNESS: I did.

6 MS. GARCIA: Objection.

7 THE WITNESS: I do.

8 MR. MORENBERG: Q. And do you recall any  
9 other discussions with Saybrook administrators  
10 regarding this project?

11 A. I just agreed to do it and then undertook  
12 the research to do it and then produced a document.

13 Q. And, Dr. Vaughan, when you agreed to do the  
14 research, was this a part of your job  
15 responsibilities as a member of the executive faculty  
16 or was this a special consulting project in addition  
17 to that?

18 MR. VARTAIN: Objection.

19 MR. MORENBERG: Q. You may answer.

20 MR. VARTAIN: Compound.

21 THE WITNESS: It was part of my job  
22 responsibility as an executive faculty member.

23 MR. MORENBERG: Q. And when did you do the  
24 research for purposes of developing the information  
25 bulletin?

1           A. I started doing the research maybe -- if I  
2 started -- maybe April or May would have been a time  
3 that I started.

4           Q. Is that April or May of 2003?

5           A. Of 2003.

6           Q. And did Dr. Bohart or Dr. Clark -- strike  
7 that.

8           Did Dr. Bohart indicate to you why he wanted  
9 you do develop the legal information -- strike that.

10           Did Dr. Bohart indicate to you why he wanted  
11 you to develop the licensing information bulletin at  
12 that time?

13           A. Yes.

14           Q. What did he tell you?

15           A. Well, both of them together -- I met with  
16 both of them together -- and I'm trying to recall the  
17 conversation. I think that they wanted to take  
18 additional steps to educate students on the  
19 regulatory scheme and to facilitate the interaction  
20 between the students and their local psychology  
21 boards. And so to have that information available to  
22 them and to have somebody available to consult with  
23 them about the reading of the statutes and the board  
24 of psychology rules I think was important.

25           Q. Do you have any specific memories of

1 Q. Did you receive any documents from Bill  
2 Bruff that were useful in your project?

3 A. Not that I can recall.

4 Q. And I have asked you about a series of  
5 individual faculty members and administrators, can  
6 you think of anyone else at Saybrook who ever  
7 provided information to you in the form of documents  
8 that was relevant to your project?

9 MR. VARTAIN: Objection.

10 THE WITNESS: Not that I can recall.

11 MR. MORENBERG: Q. And can you tell me when  
12 you completed your bulletin on licensing standards?

13 A. I think it was probably by July -- by the  
14 end of July.

15 Q. An that's July of 2003?

16 A. 2003.

17 Q. And do you know what became of that  
18 document?

19 A. Yes.

20 Q. What was it used for?

21 A. It was used to put on -- to put on a web  
22 page.

23 Q. Was that Saybrook's web page?

24 A. Yes.

25 Q. And is that --



1 A. It was the Saybrook website. It was a web  
2 page on the website.

3 Q. Is that a document that's accessible to  
4 Saybrook students?

5 A. Yes.

6 Q. And how long a document is it?

7 A. I would say maybe four pages.

8 Q. And does it provide information on specific  
9 jurisdictions?

10 A. It does.

11 Q. Does it provide information on  
12 Massachusetts?

13 A. Well, no. It just lists Massachusetts as  
14 one of the states that's problematic.

15 Q. I see.

16 A. That's it.

17 Q. And do you know if that bulletin is  
18 distributed to students in any other way such as at  
19 residential conferences?

20 A. Yes.

21 Q. And how is it distributed?

22 A. I distribute it.

23 Q. And when do you distribute it?

24 A. In the context of a general orientation on  
25 licensure.